

COLLECTIVE EXHIBIT A

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** Pro hac vice forthcoming*

*Attorneys for Plaintiffs
and the Proposed Classes*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JAMES PORTER, BRYAN PEREZ, and
DRO ESRAEILI ESTEPANIAN, on behalf
of themselves and all others similarly
situated,

Plaintiffs,

v.

TESLA, INC. d/b/a TESLA MOTORS,
INC.,

Defendant.

Case No. _____

CLASS ACTION

**VENUE DECLARATION OF
DRO ESRAEILI ESTEPANIAN**

1 I, DRO ESRAEILI ESTEPANIAN, hereby declare and state as follows:

2 1. I am over the age of 18. The facts contained in this declaration are based upon
3 my personal knowledge, and if called upon to do so, I could and would testify competently
4 hereto.


5 2. I am, and at all times relevant to this Action have been, a resident of Los
6 Angeles County, California.

7 3. In or around December 2021 or January 2022, I ordered a Tesla Model 3 Long
8 Range vehicle through the custom order tool on Tesla's website. In or around July 2022, I took
9 delivery of my Tesla vehicle.

10 4. After receiving my Tesla vehicle, I have noticed while driving the vehicle that I
11 do not receive the electric vehicle range originally advertised.

12 I declare under penalty of perjury under the laws of the United States and of the State of
13 California that the foregoing is true and correct.

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16 DATED: 08/01/2023

By:  _____

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situated,

Plaintiffs,

v.

TESLA, INC. d/b/a TESLA MOTORS,
INC.,

Defendant.

Case No. _____

CLASS ACTION

**VENUE DECLARATION OF
BRYAN PEREZ**

1 I, BRYAN PEREZ, hereby declare and state as follows:

2 1. I am over the age of 18. The facts contained in this declaration are based upon
3 my personal knowledge, and if called upon to do so, I could and would testify competently
4 hereto.

5 2. I am, and at all times relevant to this Action have been, a resident of Los Angeles
6 County, California.

7 3. In or around February 2021, I ordered a Tesla Model 3 Long Range vehicle
8 through the custom order tool on Tesla's website. In or around March 2021, I took delivery of
9 my Tesla vehicle.

10 4. After receiving my Tesla vehicle, I have noticed while driving the vehicle that I
11 do not receive the electric vehicle range originally advertised.

12 I declare under penalty of perjury under the laws of the United States and of the State of
13 California that the foregoing is true and correct.

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16 DATED: 08/01/2023

By: 

17 Bryan Perez
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DRO ESRAEILI ESTEPANIAN, on behalf
of themselves and all others similarly
situated,

Plaintiffs,

v.

TESLA, INC. d/b/a TESLA MOTORS,
INC.,

Defendant.

Case No. _____

CLASS ACTION

**VENUE DECLARATION OF
JAMES PORTER**

1 I, JAMES PORTER, hereby declare and state as follows:

2 1. I am over the age of 18. The facts contained in this declaration are based upon
3 my personal knowledge, and if called upon to do so, I could and would testify competently
4 hereto.

5 2. I am, and at all times relevant to this Action have been, a resident of Sonoma
6 County, California.

7 3. In or around March 2022, I ordered a Tesla Model Y Performance vehicle through
8 the custom order tool on Tesla's website. In or around June 2022, I took delivery of my Tesla
9 vehicle by picking it up from the Tesla dealership in Vallejo, California.

10 4. After receiving my Tesla vehicle, I have noticed while driving the vehicle that I
11 do not receive the electric vehicle range originally advertised.

12 I declare under penalty of perjury under the laws of the United States and of the State of
13 California that the foregoing is true and correct.

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16 DATED: 08/01/2023

By: J Porter

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